

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE:

KANWALDEEP KALSI

Debtor

Case No. 20-10330-MG
Chapter 7

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NAMRITA PUREWALL

Plaintiff,

V.

ESTATE OF KANWALDEEP KALSI
Constructive Trust

Adv. Pro. No.

THE TRUSTEE OF THE ESTATE OF
KANWALDEEP KALSI

KANWALDEEP KALSI

Defendants.

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**Complaint Against the Defendants for
Declaration of Constructive Trust
(Jury Trial Demanded)**

I, Namrita Purewal complaining of the defendants allege the following:

1. I am a resident of New York.
2. The defendants are residents of the New York State.
3. The Defendant Kanwaldeep Singh Kalsi has committed a series of frauds on the Court, the estate, creditors and myself.
4. As a proximate result of the defendants' blatant and fraudulent numerous misrepresentations and otherwise wrongful conduct as alleged, plaintiff suffered damages, including severe mental and emotional distress.

5. I am writing to tell the court that Kanwaldeep Singh Kalsi has no rights to the property that I am writing about, especially the real estate. The properties belong to me.
6. By reason of the fraudulent and otherwise wrongful manner in which debtor obtained any alleged right, claim or interest in and to the described property, defendant, and each of them, have no legal or equitable right, claim or interest in or to the property, but, instead, defendant, and each of them are involuntary trustees holding the property and profits from it in constructive trust for plaintiff with the duty to convey the same to plaintiff.

Factual Background:

7. Kanwaldeep Kalsi and I met on Cinco de Mayo of 2011. In December of 2011 we were engaged to be married and found a new apartment where we moved in and lived together for over a year prior to getting married. Kanwaldeep always told me “bells went off” when he met me, at the time I thought he meant they were love bells but today I realize they were target bells as he saw me as his next perfect prey.
8. After the initiation of our separation, I found an entire marriage Kanwaldeep Singh Kalsi had never disclosed to me – I was his third wife, not his second wife as he perpetrated, I found dozens of lawsuits Kanwaldeep Kalsi filed and had filed against him in India, He abandoned a wife in India and several other things he kept secret which are quite shocking revelations to find out about someone you trust and get married to.
9. Kanwaldeep Kalsi has engaged in numerous acts of fraud and misrepresentation including multiple forgeries of my signature on United States Immigration documents for the purpose of obtaining a Green Card, forgeries on IRS documents, checks, and other things I may not even be aware of.
10. I disclose this just to convey a small sense of the moral character Kanwaldeep Singh Kalsi is lacking and the lies and actions he will commence for his self gains.
11. At the time when Kanwaldeep was dating and married to me he represented himself to be a high net worth professional, an entrepreneur who had several businesses, patents,

copyrights as well as publications of himself in magazine articles speaking of his business ventures and even showed me physical evidence of the same. As Kanwaldeep Kalsi arrived in America in 2011, these were all assets of his in India, where he had and continues to have an entire life consisting of properties, land, business ventures and bank accounts overseas.

12. Kanwaldeep told me because his money and assets were in India, and the money conversion rates were too high and would result in significant losses if he was to bring his monies into the United States, it was better to use my monies to invest in houses which I insisted on having to start a family. At the same time, Kanwaldeep Kalsi insisted it was better to use his name for title as it afforded a better mortgage and interest rate.
13. Since it was only my monies and life savings, pre-marital, used for the purchase of the properties, the properties were purchased with the unequivocal understanding and promise by Kanwaldeep Singh Kalsi to me that he would transfer title to me once my credit improved and until then, he would hold the properties in trust for me. Kanwaldeep Singh Kalsi even wrote a letter to the mortgage company explaining the funds used to purchase the properties were solely mine. **EXHIBIT A**
14. With this understanding, promise and trust in place, I used my monies to purchase two properties. The first property is located at 67 Liberty Street, 5th Floor, New York, NY 10005 and the second property is located at 82 Inlet Road, Southampton, NY 11968. **EXHIBIT B**
15. In addition to wholly funding the down payments, it was I who paid the entire monthly expenses for the properties mortgages, taxes and carrying costs.
16. As my credit improved I began asking Kanwaldeep Singh Kalsi for the re-finance and transfer of title of my two properties back to me.
17. Eventually my asking turned to begging for Kanwaldeep Singh Kalsi to initiate a refinance so that I could solely take over the deed and title to my properties located at 67

Liberty Street and 82 Inlet Road as he had promised me prior to purchase and during the course of the short marriage.

18. There came a point in time my insistence of transferring title back to me became pestering to the debtor, Kanwaldeep Singh Kalsi. In December of 2016 as an attempt to get out of the situation and calm me down, Kanwaldeep Singh Kalsi wrote me checks for the value of my investment of pre marital funds and nominal appreciation/gains of the houses.

19. Kanwaldeep Singh Kalsi wrote me back checks in the amount of \$808,000 with the words "NAMS MONEY RETURN" in the memo line. **EXHIBIT C**

20. Needless to say it was not the money Kanwaldeep Singh Kalsi had promised to return to me. Kanwaldeep Singh Kalsi had promised to transfer the deed and titles to me. Since Kanwaldeep Singh Kalsi's express promise to me was to transfer the titles and houses back to me, the checks for \$808,000 were never cashed.

21. To escape the mounting preasure I was putting on Kanwaldeep Kalsi for title to my properties, Kanwaldeep Singh Kalsi simply left the country and flew back to India for almost an entire month leaving me and two babies who were 14 month old twin boys behind in January of 2017.

22. A short time after Kanwaldeep Singh Kalsi's return to the United States of America and when the pressure for title to my properties became unbearable for him in 2017, debtor filed for an "EMERGENCY ORDER TO SHOW CAUSE & DIVORCE ACTION". Debtor's filings concocted wild false allegations and video recordings of me dating back to the year 2015. Apparently Kanwaldeep Singh Kalsi had been taking secret video's of me beginning approximately three weeks after I had a c-section to deliver my twins.

23. Things started falling into place and it became clear this was all a PREMEDITATED rouse orchestrated by Kanwaldeep Singh Kalsi. Kanwaldeep Singh Kalsi knew he was

never going to transfer title to me as he always promised because he was never going to stay married to me.

24. Kanwaldeep Kalsi attempted to take and keep all the assets for himself before matrimonial court saw through his bogus charade. When debtor saw he couldn't have it all, a fraudulent bankruptcy was filed so that if he couldn't have it then he would ensure myself and the children couldn't have it either.
25. Kanwaldeep Singh Kalsi knew he had to forge my signatures on additional documents the United States Department of Citizenship and Naturalization had sent to him because he knew I would never have signed them seeing as his promises were hollow and full of lies and excuses. I bring this up for the court to take notice of how pre-meditated debtors actions are inclusive of committing crimes, and I beg the judge to take notice to how false this bankruptcy filing is and give me and my two young children my house back.
26. Kanwaldeep knew he was only out to deceitfully attain citizenship and encumber assets, monies and my properties to benefit from Unjust Enrichment by gaming the People, the Immigration and Bankruptcy Systems of the United States.
27. All the now weird comments he made to me during our marriage about Americans being so naïve, and statements like you don't have to pay anything in "this country" now rang true as debtor Kanwaldeep Kalsi is the true essence of a fraudster and conman.
28. Kanwaldeep Singh Kalsi has undoubtedly engaged in bankruptcy crimes involving fraud as he did with Immigration. He has filed false claims in his petition, knowingly concealed assets here and overseas, made false oaths, neglected disclosure of monies withdrawn in the **hundreds of thousands of dollars in months prior to bankruptcy filing**, maxed out 32 credit cards into the hundreds of thousands and filed a fraudulent petition full of misrepresentations. There are plentiful court ordered subpoenaed documents in Supreme Court, County of Suffolk which support my statements listed here with hard undisputable facts.

29. I need to make it equally undeniably clear to the court and to Judge Glenn that the properties located at 67 Liberty Street, New York, NY and 82 Inlet Road, Southampton, NY are MY PROPERTIES which Kanwaldeep Singh Kalsi held in trust for me. I paid for them, I maintained them since date of purchase and a con man who is not a citizen of this country should not be granted the ability by the judges and courts of the United States of America to game the system and it's people.
30. Due to Kanwaldeep Kalsis malicious actions to injure myself and the two young children, I can no longer afford both properties as I once could. As such, I have no issues with the Trustee selling the property located at 67 Liberty Street, New York, NY but adamantly and respectfully must make a demand to the courts for the return of my property located at 82 Inlet Drive, Southampton, NY.
31. I am now a single mother with two children, I have been left penniless, by Kanwaldeep Singh Kalsi who does not even pay his court ordered support obligations to me. All of this is also a matter of factual record in Supreme Court, County of Suffolk.
32. I have no where to go with my two children except my home in Southampton which has half the carrying cost of my Manhattan property. The exhibits clearly show my life savings in the property and Supreme Court filings will show you debtor has stolen and encumbered every other possible asset. The courts will literally be putting me and two young five year old kids in the streets and this too due to a con man who has engaged in a fraudulent filing and other criminal actions.
33. Debtors Actions have been WILLFUL and Malicious against all legal parameters, and the properties were held in trust for me as they were fully paid for and maintained by me with promises of title transfer by Kanwaldeep Kalsi whom unfortunately I had no idea at the time was going to commit fraud and crimes of moral turpitude against me and the United States.
34. It is now the courts job to protect me, my two young children and I would like to exercise my right to a jury trial to explain further if the evidence I have submitted is somehow not

enough. I can no longer afford lawyers and justice should not only be for those who can afford it.

WHEREFORE, plaintiff requests judgment against defendants, and each of them, as follows:

1. A declaration that defendants hold the described property as constructive trustees for the benefit of the plaintiff;
2. A declaration that defendants, or either of them, do not possess or own any interest in the described property;
3. Ordering the conveyance of the described property from defendants to plaintiff, free and clear of any and all interests, liens, and claims;
4. Awarding plaintiff damages in that amount of \$3.5 million
5. Awarding costs of suit incurred; and
6. Granting such other and further relief as the court may deem proper.

Dated: May 4, 2021, 2021

/s/Namrita Purewal
Namrita Purewal